

Hearing Date and Time: August 16, 2007 at 10:00 a.m.
Response Date and Time: August 9, 2007 at 4:00 p.m.

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Attorneys for Empresas Ca Le Tlaxcala SA de CV

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	
Debtors.	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
	:	
-----X	:	

RESPONSE OF EMPRESAS CA LE TLAXCALA SA DE CV (CLAIM NUMBER 15511)
TO DEBTORS' NINETEENTH OMNIBUS OBJECTION (SUBSTANTIVE)
PURSUANT TO 11 U.S.C. §502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN
(A) INSUFFICIENTLY DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED
ON DEBTORS' BOOKS AND RECORDS, (C) UNTIMELY CLAIM, AND (D) CLAIMS
SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION,
MODIFIED CLAIMS ASSERTING RECLAMATION, AND CONSENSUALLY
MODIFIED AND REDUCED CLAIMS

Empresas Ca Le Tlaxcala SA de CV (“Empresas”) responds to the objection of Delphi Corporation and its debtor affiliates (collectively, the “Debtors”) concerning claim number 15511 that Empresas filed against Delphi Corporation as follows:

1. Empresas filed claim number 15511 as a general unsecured claim in the amount of \$184,306.40. This claim is based upon unpaid invoices arising from the sale of goods, specifically automotive batteries, by Empresas to the Debtors during 2005 before the commencement of these chapter 11 bankruptcy proceedings.

2. The Debtors have objected to claim number 15511 because only a portion of the amount claimed is apparently reflected on the Debtors’ books and records. Even though Empresas’ claim is presumed to be valid, the Debtors assert without any further support that claim number 15511 should be allowed in the reduced amount of \$64,346.40, which is the amount shown on the Debtors’ schedules.

3. Since filing claim number 15511, Empresas has further reviewed the outstanding invoices in question in order to refine the amount owed that is in addition to the figure that appeared on the Debtors’ schedules. From this review, Empresas has determined that the total amount owed it by the Debtors on this claim is \$180,169.92, which is the total of the additional invoices, \$115,823.52, plus the scheduled amount of \$64,346.40. Therefore, Empresas is agreeable to reducing the amount of claim number 15511 to \$180,169.92 and having it allowed in such reduced amount.

4. Copies of the invoices comprising the additional amount of \$115,823.52 owed, as well as related bills of lading, are attached hereto.

5. Empresas has also filed a separate proof of claim, claim number 15512, for environmental remediation obligations and other contractual liabilities owed to it by the Debtors. Any resolution of claim number 15511 is not intended to affect Empresas' claim number 15512.

6. In the circumstances, the objection to claim number 15511 should be overruled and Empresas' claim number 15511 should be allowed in the reduced amount of \$180,169.92. The person authorized to reconcile and resolve this objection is Stephen T. Bobo, Reed Smith Sachnoff & Weaver, 10 South Wacker Drive, 40th Floor, Chicago, Illinois 60606, 312-207-6480.

Dated: August 9, 2007

RESPECTFULLY SUBMITTED

Empresas Ca Le Tlaxcala SA de CV

By: /s/ Elena Lazarou

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